

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

TIMOTHY BOZUNG, individually and on behalf of all others similarly situated,

Plaintiff,

v.

CHRISTIANBOOK, LLC f/k/a
CHRISTIAN BOOK DISTRIBUTORS
CATALOG, LLC,

Defendant.

Case No. 1:22-cv-00304-HYJ-RSK

Honorable Hala Y. Jarbou

JURY TRIAL DEMANDED

BRIEF IN SUPPORT OF PLAINTIFF'S MOTION TO SEAL CERTAIN PORTIONS OF PLAINTIFF'S PROPOSED REPLY BRIEF AND THE EXHIBIT ATTACHED THERETO (IN SUPPORT OF PLAINTIFF'S MOTION FOR RELIEF FROM JUDGMENT PURSUANT TO FED. R. CIV. P. 59(e) & FED. R. CIV. P. 60(b) AND FOR LEAVE TO FILE SECOND AMENDED COMPLAINT PURSUANT TO FED. R. CIV. P. 15(a))

STATEMENT OF ISSUE PRESENTED

Whether Plaintiff may file under seal certain references and documents in Plaintiff's proposed Reply in support of Plaintiff's Motion for Relief From Judgment Pursuant to Fed. R. Civ. P. 59(e) & Fed. R. Civ. P. 60(b) and for Leave to File Second Amended Complaint Pursuant to Fed. R. Civ. P. 15(a) pending a ruling by the Court on the continued sealing of those references to the Confidential Documents?

Plaintiff answers: Yes.

CONTROLLING OR MOST APPROPRIATE AUTHORITIES

- W.D. Mich. LCivR 10.6

For the reasons explained in the above Motion, Plaintiff respectfully seeks to file under seal certain references and documents in Plaintiff's proposed Reply in support of Plaintiff's Motion for Relief From Judgment Pursuant to Fed. R. Civ. P. 59(e) & Fed. R. Civ. P. 60(b) and for Leave to File Second Amended Complaint Pursuant to Fed. R. Civ. P. 15(a) and attached exhibit thereto.

Dated: May 4, 2023

Respectfully submitted,

/s/ E. Powell Miller
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Counsel for Plaintiff and the Putative Class

CERTIFICATE OF SERVICE

I hereby certify that on May 4, 2023, I electronically filed the foregoing documents using the Court's electronic filing system, which will notify all counsel of record authorized to receive such filings.

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